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11 IN THE UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13
14 UNITED STATES OF AMERICA,
15 Plaintiff,
v.
16 LEONARDO FLORES BELTRAN,
17 Defendant.

CASE NO. 2:21-CR-0007-MCE
STIPULATION FOR EXTENSION OF TIME FOR
PRELIMINARY HEARING PURSUANT TO RULE
5.1(d) AND EXCLUSION OF TIME
DATE: January 28, 2021
TIME: 2:00 p.m.
COURT: Hon. Carolyn K. Delaney

18 Plaintiff United States of America, by and through its attorney of record, Assistant United States
Attorney DAVID W. SPENCER, and defendant LEONARDO FLORES BELTRAN, both individually
and by and through his counsel of record, CHRISTOPHER R. COSCA, hereby stipulate as follows:

20 1. The Complaint in this case was filed on January 11, 2021, and defendant first appeared
21 before a judicial officer of the Court in which the charges in this case were pending on January 14, 2021.
22 The court set a preliminary hearing date of January 28, 2021.

23 2. By this stipulation, the parties jointly move for an extension of time of the preliminary
24 hearing date to February 4, 2021, at 2:00 p.m., before the duty Magistrate Judge, pursuant to Rule 5.1(d)
25 of the Federal Rules of Criminal Procedure. The parties stipulate that the delay is required to allow the
26 defense reasonable time for preparation, and because defense counsel is unavailable on the current
27 hearing date. The parties further agree that the interests of justice served by granting this continuance
28 outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

1 3. The parties agree that good cause exists for the extension of time, and that the extension
2 of time would not adversely affect the public interest in the prompt disposition of criminal cases.
3 Therefore, the parties request that the time between January 28, 2021, and February 4, 2021, be
4 excluded pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), Local Code T-4.

5 IT IS SO STIPULATED.

6 Dated: January 27, 2021

7 McGREGOR W. SCOTT
United States Attorney

8 _____
9 /s/ DAVID W. SPENCER
10 DAVID W. SPENCER
11 Assistant United States Attorney

12 Dated: January 27, 2021

13 _____
14 /s/ CHRISTOPHER R. COSCA
15 CHRISTOPHER R. COSCA
16 Counsel for Defendant
17 LEONARDO FLORES BELTRAN